

# Restructuring Food Safety at HHS

## Problem

The HHS food safety program is organizationally fragmented and dispersed in the bureaucracy, largely out of sight of the Secretary.

At FDA, food safety responsibility is divided among multiple, separately-managed units of the agency, including the Office of the Commissioner, the Center for Food Safety and Applied Nutrition, the Center for Veterinary Medicine, the field force (Office of Regulatory Affairs), and the National Center for Toxicological Research.

FDA is unable to exert leadership and be held accountable on food safety because there is no single official whose full time job is food safety *and* who has line authority over all elements of FDA's food safety program. FDA's food safety program is further impaired because it has chronically taken a back seat to FDA's drug and medical device programs in the competition for scarce FDA resources and top management attention.

The critical food safety surveillance and outbreak investigation functions of HHS are performed by the Centers for Disease Control and Prevention (CDC), which is organizationally and managerially entirely separate from FDA and lacks clear accountability for meeting the essential information needs of the FDA officials responsible for designing and implementing measures to prevent foodborne illness.

## Solution

The *Food Safety Modernization Act* calls for a major shift in policy and program away from a reactive response to problems and toward science-based prevention. The bill also calls for a much stronger international presence and role for HHS to ensure the safety of imported foods. To lead this transformation and be successful in the long term, HHS needs a leadership and management structure for food safety with the following attributes:

- Clearly-defined management responsibility, authority and accountability.
- Capacity to integrate all HHS food safety activities.
- Capacity to deploy all resources strategically in support of a coherent risk-based plan to improve food safety.
- Heightened standing within the government system.
- Capacity for food safety leadership, nationally and internationally.

The current structure does not meet these needs.

While the Secretary of HHS has substantial authority to organize the Department's activities, any substantial restructuring requires collaboration between the executive branch and Congress, and legislation would be needed to create an HHS food safety agency separate from FDA.

It is also clear that any reorganization must be carefully planned and implemented to achieve its positive goals and minimize cost and disruption.